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Jim Plasker, Executive Director  
The American Society for Photogrammetry & Remote Sensing  
5410 Grosvenor Lane, Suite 210  
Bethesda, MD 20814-2160

Dear Mr. Plasker:

On behalf of the California GIS Council (CGC), I want to thank you for the opportunity to review the draft *ASPRS Procurement Guidelines* and provide feedback. I am the Chair of CGC, which is the geospatial planning and coordination organization for the state of California. Following the release of your *Guidelines* in November, members of our Imagery Working Group expressed interest in reviewing and commenting on the document. The Working Group recently met to discuss the content and we offer the following points to consider from a State of California point of view.

First, we want to acknowledge the effort put into the development of the *Guidelines* and applaud the stated intent of wanting to provide assistance to users of photogrammetric services. We have also had the opportunity to review comments about these guidelines from the Geospatial Information and Technology Association (GITA), the Urban and Regional Information Systems Association (URISA) and a memo jointly authored by a number of "participating firms" (e.g., eMap International, ESRI, MJ Harden, Intermap, Optech, Pictometry, and Sanborn). In general, we support their comments and concerns. These guidelines require significant reworking if they are to truly serve the needs of the consumers of photogrammetric services.

Within the *Guidelines*, we observed three issues worthy of additional comment, (1) the method of vendor selection, (2) technical aspects to consider in procurement, and (3) the value of independent quality assurance review.

The *Guidelines* explain qualifications-based selection (QBS) and cite it as the preferred method in selecting photogrammetric products and services, but are seriously deficient in any treatment of other methods of vendor selection. Whereas QBS is the method employed by federal agencies and many state organizations, most local and regional government agencies do not have the luxury of devoting staff resources and time needed to develop a comprehensive base of potential remote sensing vendors. Many customers include municipalities, counties, and councils of government that do not have the knowledge of the industry and experience of state and federal entities. Cost information contained in proposals provides a starting point for those groups with limited experience and in-house resources for photogrammetric products and services. That being said, we do agree that the importance of cost in selection can be limited and kept appropriate by proper weighting of the evaluation criteria. The type of organization, size of project, deliverables, and their time line all play a role in deciding what selection process to use. Moreover, we believe these issues apply to Federal and state procurements as well, and that ASPRS should not endorse QBS as the only or preferred method selecting products and services.



Further, the confusion around licensure for professional photogrammetric services and the distinction between 'professional' services and/or products that may, or do not, require licensure (as raised in the memo by "participating firms") may cause agencies unneeded expense and contracting complication. We suggest you refer to the NCEES Model Rules (sec. 210.25) to distinguish activities that really go under the umbrella of "high-quality referential but not-authoritative" (in other words, non-surveyed) mapping services or data production.

The *Guidelines* address methods of selection and descriptions of photogrammetric services but do not provide much detail on the actual tasks and technical issues faced by organizations during the procurement process. There are common criteria that selection committees need to address regardless of whether QBS is employed or not. Details on some of the considerations in evaluating qualifications could be very beneficial. For example -

- Experience – total experience and familiarity with project requirements
- Project manager – background, access, stability of position
- Product throughput – can products/services be concluded on schedule?
- Production methodology – what technology and processes will be applied?
- Quality assurance – internal review, employing a third party QA group
- Past performance – meeting deadlines, accepted/rejected product, references (which may include non-vendor specified referrals)


Local imagery groups are dependent upon well-constructed and technically specific Requests for Proposals as well as detailed proposals from vendors; ASPRS could provide an invaluable service to the GIS community by providing example RFP documents, technical specifications, and contract language that would help ensure the best possible product at a reasonable and competitive cost.

CGC recently completed our *Imagery Business Plan & Best Practices Report* which discusses some of the best practices learned in California in imagery procurement. Though the ASPRS *Guidelines* cover a larger array of services beyond imagery, we feel some of the things we learned may benefit ASPRS members and their organizations. I have attached our executive summary as a reference and the complete document can be found at [www.cgia.org/imagery-project.htm](http://www.cgia.org/imagery-project.htm).

Perhaps the most important 'best practice' identified through our ongoing assessment of imagery and elevations acquisitions throughout the state of California is the notion of third-party independently awarded quality control and assurance, and this facet of the work process can in fact be combined with overall project management for an effective and timely data acquisition.

In closing, we acknowledge that procurement for services such as these are very complex and ever changing, along with the technology. Many technologies such as LiDAR are continually evolving and so will the professional services behind it. We realize, too that the *Guidelines* are a work in progress and the issues we raise may be addressed later. To this end, we feel that the *Guidelines* represent a good start but that future edits and expansions are clearly needed. If the GIS community in California can further serve the ASPRS committee by participating in the crafting of these *Guidelines*, we would welcome the opportunity.

Sincerely,



Michael Byrne  
Chair, California GIS Council